

FILED

JUL 09 2020

CLERK, U.S. DISTRICT COURT
WESTERN DISTRICT OF TEXAS
BY ab DEPUTY

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TEXAS
PECOS DIVISION

UNITED STATES OF AMERICA,) NO. P-20-CR-
)
Plaintiff,) **INDICTMENT**
) [Vio: 31 USC 5332,
V.) Bulk Cash Smuggling;
) 18 USC 2, Aiding and abetting;
ALEJANDRO ESTRADA) **Notice of Government's**
A/K/A ALEJANDRO CARRILLO,) **Demand for Forfeiture]**
)
Defendant.)

P20 CR 315

The Grand Jury Charges:

Count One
[31 U.S.C. § 5332(a) and 18 U.S.C. § 2]

On or about June 4, 2020, in the Western District of Texas, Defendant,

ALEJANDRO ESTRADA
A/K/A ALEJANDRO CARRILLO,

aided and abetted by others, did knowingly, with intent to avoid a currency reporting requirement, did conceal \$175,935.00 in U.S. currency, in the driver and passenger side quarter panels of the vehicle the Defendant was operating, transport and transfer, and attempt to transport and transfer such money instruments from a place inside the United States to a place outside the United States, to wit, Mexico, without filing a Report of International Transportation of Currency or Monetary Instruments (Customs Form 4790), as required by 31 Code of Federal Regulations, Sections 103.23.

In violation of Title 31, United States Code, Section 5332 and Title 18, United States Code Section 2.

NOTICE OF GOVERNMENT'S DEMAND FOR FORFEITURE

I. Bulk Cash Smuggling Forfeiture Statutes
[31 U.S.C. § 5332]

As a result of the criminal violation set forth in Count One of the Indictment, the United States gives notice to Defendant ALEJANDRO ESTRADA A/K/A ALEJANDRO CARRILLO of its intent to seek the forfeiture of the below-described property upon conviction and pursuant to FED. R. CRIM. P. 32.2 and 31 U.S.C. § 5332(b)(2), which states in pertinent part:

31 U.S.C. § 5332. Criminal Forfeiture

(b)(2) [T]he court, in imposing sentence under paragraph (1), shall order that the defendant forfeit to the United States, any property, real or personal, involved in the offense, and any property traceable to such property.

II. Subject Property

This Notice of Demand for Forfeiture includes, but is not limited to, the following property:

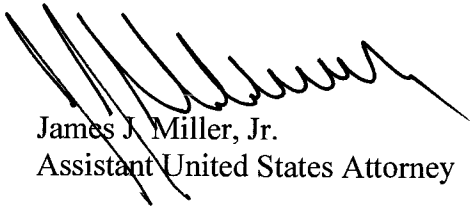
- \$175,935.00, more or less, in U.S. currency seized from defendant on or about June 4, 2020.

A True Bill.

**Original signed by the
foreperson of the Grand Jury**

Foreperson

John F. Bash
United States Attorney


James J. Miller, Jr.
Assistant United States Attorney